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Secretary for
Environmental Protection

Department of Toxic Substances Control

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Arnold Schwarzenegger
Governor

November 26, 2008

Marine Corps Air Station El Toro
Base Realignment and Closure
Attn: Ms. Debra Theroux
Deputy Base Closure Manager
7040 Trabuco Road
Irvine, California 92618

COMMENTS ON DRAFT SUMMARY REPORT FOR GROUP VI POTENTIAL RELEASE LOCATIONS (PRLS), FORMER MARINE CORPS AIR STATION (MCAS) EL TORO, IRVINE, CALIFORNIA

Dear Ms. Theroux:

The California Department of Toxic Substances Control (DTSC) has reviewed the subject report (Report) which was received on October 23, 2008. The Report presents the results of the site inspection and investigation conducted at the six PRLs in this group. Group VI PRLs include PRLs 296, 297, 354, 605, 606, and Runway Infield Area (RIA). The conclusions and recommendations for each PRL were based on analytical results, which include previously available data, and screening risk assessments. Based on all available information, the Report recommends that no further investigation (NFI) is warranted for all six PRLs.

Based on the review of the Report, DTSC has the following comments:

1. DTSC concurs with the NFI recommendation for all PRLs except PRL 354.
2. PRLs 605 and 606:
 - a. The former MCAS El Toro background value for arsenic is listed as 6.86 mg/kg. Because DTSC also saw this background listed as 8.5 mg/kg in another El Toro document, please verify what the appropriate background for arsenic is.
 - b. The Report states that upon transfer, the new land owner will be notified about the presence of these localized elevated arsenic concentrations. Please

Ms. Debra Theroux
November 26, 2008
Page 2 of 3

explain in detail how the notification procedure will be documented, recorded, and implemented such that the new land owner will absolutely be notified.

3. PRL 354: According to the Report, the cumulative cancer risk due to potential exposure to reasonable maximum exposure point concentration (EPC) of constituents analyzed is 2×10^{-5} . The cumulative carcinogenic risk corresponding to a benzo(a)pyrene equivalent EPC value of 1,068 $\mu\text{g/kg}$ is 2×10^{-5} . If the statistical outlier is not included in the risk assessment, the cumulative cancer risk reduces to 9×10^{-6} .

DTSC notes that the cumulative cancer risk falls in the middle of the risk management range of 10^{-6} to 10^{-4} whether the outlier is included or not. It appears that PRL 354 has polycyclic aromatic hydrocarbon (PAH) contamination in surface soil that could pose risks to human health. DTSC does not concur that the available information is adequate to support an NFI decision.

Thank you for the opportunity to review and comment on the Report. Please provide the responses to these comments at your earliest convenience. If you have any questions about this letter, please contact me at (714) 484-5352 or qthan@dtsc.ca.gov.

Sincerely,



Quang Than
Remedial Project Manager
Brownfields and Environmental Restoration Program

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Ms. Debra Theroux
November 26, 2008
Page 3 of 3

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